

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 00-6258-CR-FERGUSON

UNITED STATES OF AMERICA)
)
)
)
V.)
)
)
LIDIA ESTER RAMOS,)
)
Defendant.)
)
)

FILED BY  DCC
MAY 25 AM 11:45
CLERK, U.S. DIST. CT.
S.D. OF FLA. FT. MYERS

**GOVERNMENT'S SUPPLEMENTAL RESPONSE
TO STANDING DISCOVERY ORDER**

The United States of America hereby files this supplemental response to the Standing Discovery Order issued in this case. This supplemental response is numbered to correspond to that Order.

A. 1. There were telephone conversations and meetings recorded during the investigation. Enclosed please find copies of tape recordings marked N-70, N-72, and N-73.

B. The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made to pursuant to Rule 16(b) of the **Federal Rules of Criminal Procedure**.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule (16)b of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense were:

1. Date: On or about August 23 and 24, 2000
Place: Pembroke Lakes Mall, Pembroke Pines, Florida; Swayne
Plumbing at 6299 Johnson Street, Hollywood, Florida;
Raymond's Grocery Store at 6301 Johnson Street, Hollywood,
Florida; and 3361 SW 38 Street in Hollywood, Florida.

Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

By:


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this
25th day of January 2001 to Nelson Rodriguez, Esquire, 6780 Coral Way, Miami, Florida
33155.


DONALD F. CHASE, II

ASSISTANT UNITED STATES ATTORNEY